

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

CLOVIS L. PRINCE, et al.

Debtors.

CASE NO. 09-43627
Jointly Administered
(Chapter 7)

MICHELLE CHOW, CHAPTER 7
TRUSTEE FOR THE ESTATES OF
CLOVIS L. PRINCE, CROWN
PROJECT MANAGEMENT, INC., and
C. PRINCE & ASSOCIATES
CONSULTING, INC.,

Plaintiff,

v.

ADV. NO. 10-04214

CLOVIS L. PRINCE and
KATHERINE M. ROBINSON,
AS TRUSTEE(S) OF THE CLOVIS
L. PRINCE, KATHERINE M. ROBINSON,
AND TAMIIKA D. PRINCE TRUST;
KATHERINE M. ROBINSON, and
P&A REAL ESTATE, INC.,

Defendants.

**ANSWERS OF: I) KATHERINE M. ROBINSON; AND II) CLOVIS L. PRINCE,
KATHERINE M. ROBINSON, AND TAMIIKA D. PRINCE TRUST TO COMPLAINT TO
AVOID FRAUDULENT TRANSFERS AND FOR TURNOVER**

TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

Katherine M. Robinson (“Ms. Robinson”) and Katherine M. Robinson as the Trustee of the Clovis L. Prince, Katherine M. Robinson, and Tamika D. Prince Trust (the “Trust”) file their Answers to Complaint to Avoid Fraudulent Transfers and for Turnover (“Answer”) and would respond to the allegations in the Complaint to Avoid Fraudulent Transfers and for Turnover (“Complaint”) filed by Michelle Chow, Trustee for the bankruptcy estates of Clovis L. Prince,

Crown Project Management, Inc., and C. Prince & Associates Consulting, Inc. (“Trustee”) as follows:

Answer

1. Ms. Robinson and the Trust (collectively referred to as “Defendants”) admit the allegations contained in paragraph 1 of the Complaint.
2. Defendants admit the allegations contained in paragraph 2 of the Complaint.
3. Defendants admit the allegations contained in paragraph 3 of the Complaint.
4. Defendants admit the allegations contained in paragraph 4 of the Complaint.
5. Defendants admit the allegations contained in paragraph 5 of the Complaint other than the allegation that Ms. Robinson is the wife of Clovis Prince and the allegation that Mr. Prince is a beneficiary of the trust.
6. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraph 6 of the Complaint.
7. Defendants deny the allegations contained in paragraph 7 of the Complaint.
8. Ms. Robinson admits that she received some rents from the properties. Defendants deny the remaining allegations contained in paragraph 8 of the Complaint.
9. Defendants deny the allegations contained in paragraph 9 of the Complaint.
10. Defendants deny the allegations contained in paragraph 10 of the Complaint.
11. Defendants deny the allegations contained in paragraph 11 of the Complaint.
12. Defendants deny the allegations contained in paragraph 12 of the Complaint.
13. Defendants deny the allegations contained in paragraph 13 of the Complaint.
14. Defendants deny the allegations contained in paragraph 14 of the Complaint.
15. Defendants deny the allegations contained in paragraph 15 of the Complaint.

WHEREFORE, PREMISES CONSIDERED, Ms. Robinson and the Trust request that all relief sought in the Complaint be denied and that Ms. Robinson and the Trust be granted such other and further relief to which they may be justly entitled.

Respectfully submitted,

QUILLING, SELANDER, CUMMISKEY
& LOWNDS, P.C.
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By: /s/ Christopher J. Moser
Christopher J. Moser
State Bar No. 14572500

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via electronic means as listed on the Court's ECF noticing system or by regular first class mail, on this 1st day of October, 2010 upon the following:

Katherine M. Robinson
318 Covington Ct.
Murphy, TX 75094

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Kerry S. Alleyne-Simmons
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/s/ Christopher J. Moser

Michelle Chow, Trustee
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